

NORTH CAROLINA  
WAKE COUNTY



BEFORE THE  
DISCIPLINARY HEARING COMMISSION  
OF THE  
NORTH CAROLINA STATE BAR  
11 DHC 19

THE NORTH CAROLINA STATE BAR, )  
 )  
Plaintiff )  
 )  
vs. )  
 )  
DEAN H. HUMPHREY, )  
 )  
Defendant. )

**ANSWER**

NOW COMES Defendant by and through the undersigned attorney answering Plaintiff's complaint as follows:

1. Paragraph one of Plaintiff's complaint is admitted.
2. Paragraph two of Plaintiff's complaint is admitted.
3. Paragraph three of Plaintiff's complaint is admitted.
4. Paragraph four of Plaintiff's complaint is admitted.
5. Paragraph five of Plaintiff's complaint is admitted.
6. Paragraph six of Plaintiff's complaint is admitted.
7. Paragraph seven of Plaintiff's complaint is admitted.
8. Paragraph eight of Plaintiff's complaint is admitted.
9. Paragraph nine of Plaintiff's complaint is admitted.
10. Paragraph ten of Plaintiff's complaint is admitted.
11. Paragraph eleven of Plaintiff's complaint is admitted.
12. Upon information and belief, paragraph twelve of Plaintiff's complaint is admitted. Defendant's notes do not reflect the amount of Integon's actual offer.
13. Defendant admits that he had already settled the case on April 15, 2010, but

denies that the April 16, 2010 letter was false regarding the amount of the final settlement offer.

14. Paragraph fourteen of Plaintiff's complaint is admitted.
15. Paragraph fifteen of Plaintiff's complaint is admitted.
16. Defendant admits that he had already settled the case on April 15, 2010, but denies that the April 16, 2010 letter was false regarding the amount of the final settlement offer.
17. Paragraph seventeen of Plaintiff's complaint is admitted.
18. Paragraph eighteen of Plaintiff's complaint is admitted.
19. Paragraph eighteen of Plaintiff's complaint is admitted.
20. Paragraph twenty of Plaintiff's complaint is admitted.
21. Paragraph twenty-one of Plaintiff's complaint is admitted.
22. Paragraph twenty-two of Plaintiff's complaint is admitted.
23. Paragraph twenty-three of Plaintiff's complaint is admitted.
24. Paragraph twenty-four of Plaintiff's complaint is admitted.
25. Upon information and belief, paragraph twenty-five of Plaintiff's Complaint is admitted.
26. Paragraph twenty-six of Plaintiff's Complaint is admitted.
27. Paragraph twenty-seven of Plaintiff's Complaint is admitted.
28. Paragraph twenty-eight of Plaintiff's Complaint is admitted.
29. Paragraph twenty-nine of Plaintiff's Complaint is admitted.
30. Paragraph thirty of Plaintiff's Complaint is admitted.
31. Defendant admits that he had settled both claims without the two clients' knowledge. Moore did tell Defendant in a telephone conversation that she was satisfied with a settlement of \$8,750.00 and that she was certain Curry would be similarly satisfied with a settlement of \$8,000.00.

32. Paragraph thirty-two of Plaintiff's Complaint is admitted.

WHEREFORE, having stated his Answer to the Complaint, Defendant prays the Disciplinary Hearing Committee as follows:

1. That the Disciplinary Hearing Committee convene to determine what discipline is warranted for the Rule violations admitted herein.

RESPECTFULLY SUBMITTED, this the 17<sup>th</sup> day of August, 2011

CHESHIRE, PARKER, SCHNEIDER & BRYAN

A handwritten signature in black ink, appearing to read "Alan M. Schneider", with a long horizontal flourish extending to the right.

Alan M. Schneider  
State Bar Number 17591  
133 Fayetteville Street  
Post Office Box 1029  
Raleigh, North Carolina 27602  
Telephone: (919) 833-3114


Attorney for Defendant

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the above and foregoing Answer was **HAND-DELIVERED** to the following:

William Farrell  
Deputy Counsel  
North Carolina State Bar  
208 Fayetteville Street Mall  
P.O. Box 25908  
Raleigh, North Carolina 27611

This the 17<sup>th</sup> day of August, 2011.

  
Alan M. Schneider